

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143
The Honorable Judge Ellis

Motions Hearing: May 7, 2021
Trial: July 12, 2021

HEARING REQUESTED

**DEFENDANT'S MOTION FOR ENTRY OF DISCOVERY ORDER AND
MODIFICATION OF PROTECTIVE ORDER**

The defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court for entry of a discovery order and for modification of the protective order previously entered on April 27, 2020 (ECF No. 28) in order to maintain the existing July 12, 2021 trial date and protect Mr. Sanders's Fifth and Sixth Amendment rights by allowing Mr. Sanders to review material that underlies the government's case-in-chief and material that is exculpatory. Mr. Sanders relies on the accompanying Memorandum as grounds for this motion.

Respectfully submitted,

ZACKARY ELLIS SANDERS
By Counsel

Respectfully submitted,

/s/
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Counsel for Defendant Zackary Ellis Sanders

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of April 2021, the foregoing was served electronically on counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress
Jonathan Jeffress